



Corteva Agriscience  
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USA

December 09, 2021

Office of Pesticide Programs  
Registration Division (7505P)  
U. S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
William Jefferson Clinton Bldg. East  
Washington, DC 20004

Attention: Eric Bohnenblust  
Minor Use and Emergency Response Branch Chief  
Cc: Emily Schmid, PM 25

**AMINOCYCLOPYRACHLOR, CAS NUMBER 858956-08-8, USEPA PC CODE 288008  
METHOD 240SL HERBICIDE, EPA REGISTRATION NUMBER: 432-1565  
SPECIAL LOCAL NEEDS NUMBER: ND210003**

**REQUEST FOR DISAPPROVAL OF STATE REGISTRATION IN ACCORDANCE WITH 40 CFR  
162.154 PARAGRAPH (a)(1)(i) and PARAGRAPH (a)(1)(iii)**

It has come to our attention that a SLN was submitted by the state of North Dakota for the use of Method 240SL Herbicide (EPA Reg. # 432-1565; SLN # ND210003) on 19-Nov-2021.

Corteva Agriscience respectfully requests the EPA to disapprove the state registration of Method 240SL Herbicide made by the state of North Dakota in accordance with 40 CFR 162.154 (a)(1)(i) Probable creation of unreasonable adverse effects on man or the environment by the registered use and 40 CFR 162.154 (a)(1)(iii) Failure of information submitted by the State to support the State's decision to issue the registration under standards established by § 162.153.

40 CFR 162.154 (a)(1)(i) Probable creation of unreasonable adverse effects on man or the environment by the registered use

Method 240SL Herbicide EPA Reg. # 432-1565; SLN # ND210003) consists of Aminocyclopyrachlor active ingredient which has limited use in certain states (AZ, NM, OK, and TX only) for use grasslands. It should be noted that the Method 240SL Herbicide label does not support any grassland uses. The use restrictions for Method 240SL Herbicide significantly exceed those for Tordon 22K which is approved for these uses. Allowance of Method 240SL to be used on grasslands in lieu of currently available registered products enables increased exposure and the potential for adverse effects in the environment.

40 CFR 162.154 (a)(1)(iii) Failure of information submitted by the State to support the State's decision to issue the registration under standards established by § 162.153

Under the "Unreasonable adverse effects determination" 40 CFR 162.153 (c)(1)(iii) it states, "for use of a product for which other uses of the same product, or of a product with a similar composition, have had registration denied, disapproved, suspended, or cancelled by the Administrator". Corteva has a registered product, Tordon 22K (EPA Reg# 62719-6) that has served as the primary treatment for leafy spurge on grazed areas. This registration is active and Corteva has been able to and will continue to supply adequate product in the state of North Dakota to meet agricultural needs.

Based on these grounds, Corteva Agriscience requests that US EPA disapproves the Special Local Need registration (SLN# ND210003) submitted by the state of North Dakota.

A copy of this letter has been sent to Eric Delzer, Pesticide & Fertilizer Division Director, North Dakota Dept. of Agriculture; FedEx Tracking ID: 9473 2640 1970.

If you require additional information, please contact me at 317-337-6226 ([maria.pavlakos@corteva.com](mailto:maria.pavlakos@corteva.com)).

Sincerely,

A handwritten signature in black ink that reads "M. Pavlakos". The signature is written in a cursive style with a large, stylized "M" and "P".

Maria Pavlakos  
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